

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

CONTENTGUARD HOLDINGS, INC.,

Plaintiff,

v.

AMAZON.COM, INC.; APPLE INC.;
BLACKBERRY LIMITED (FKA RESEARCH
IN MOTION LIMITED) AND BLACKBERRY
CORPORATION (FKA RESEARCH IN
MOTION CORPORATION); HTC
CORPORATION AND HTC AMERICA, INC.;
HUAWEI TECHNOLOGIES CO., LTD. AND
HUAWEI DEVICE USA, INC.; MOTOROLA
MOBILITY LLC; SAMSUNG ELECTRONICS
CO., LTD., SAMSUNG ELECTRONICS
AMERICA, INC., and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC,

Defendants,

and

DIRECTV, LLC

Intervener.

No. 2:13-cv-01112 (JRG)

JURY TRIAL DEMANDED

**NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF
AMAZON.COM'S MOTION TO DISMISS SECOND AMENDED COMPLAINT**

Defendant Amazon.com, Inc. ("Amazon") files this notice to inform the Court of five recent decisions relevant to Amazon's Motion to Dismiss Second Amended Complaint: *CertusView Technologies, LLC v. S & N Locating Services, LLC*, Civil No. 2:13cv346, 2015 WL 269427 (E.D. Va. Jan. 21, 2015) (attached as exhibit A), *Open Text S.A. v. Box, Inc.*, Case No. 13-cv-04910-JD, 2015 WL 269036 (N.D. Cal. Jan. 20, 2015) (attached as exhibit B), *Synopsys, Inc. v. Mentor Graphics Corp.*, No. C 12-6467 MMC, 2015 WL 269116 (N.D. Cal. Jan. 20,

2015) (attached as exhibit C), *East Coast Sheet Metal Fabricating Corp. v. Autodesk, Inc.*, Civil No. 12-cv-517-LM, 2015 WL 226084 (D.N.H. Jan. 15, 2015) (attached as exhibit D), and *Morsa v. Facebook, Inc.*, No. SACV 14-161-JLS (JPRx), 2014 WL 7641155 (C.D. Cal. Dec. 23, 2014) (attached as exhibit E). All five of these recent decisions invalidate patents analogous to the patents-in-suit as drawn to unpatentable subject matter under 35 U.S.C. § 101.

These decisions are relevant to the arguments Amazon makes in its Motion to Dismiss Second Amended Complaint (Dkt. No. 298) and its Reply Brief in Support of Amazon.com's Motion to Dismiss Second Amended Complaint (Dkt. No. 351).

January 26, 2015

Respectfully submitted,

/s/ Jennifer H. Doan

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on January 26, 2015. *See* Local Rule CV-5(a)(3)(A).

/s/ Jennifer H. Doan

Jennifer H. Doan